

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

MATTHEW CARR, TERRY CARR,  
DAVID TUMBLIN, GREGORY BROWN,  
JAMES CHECCA, and PAUL GLENNON,  
*individually and on behalf of all similarly  
situated individuals,*

Plaintiffs,

v.

FLOWERS FOODS, INC. *and* FLOWERS  
BAKING CO. OF OXFORD, INC.,

Defendants.

No. 2:15-cv-06391-LS

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LUKE BOULANGE, *on behalf of himself and  
all others similarly situated,*

Plaintiff,

v.

FLOWERS FOODS, INC. *and* FLOWERS  
BAKING CO. OF OXFORD, INC.,

Defendants.

No. 2:16-cv-02581-JD

**DEFENDANTS' MOTION TO CONSOLIDATE RELATED ACTIONS**

COME NOW Defendants Flowers Foods, Inc. and Flowers Baking Co. of Oxford, Inc. (collectively, "Defendants") and, for the reasons set forth in the memorandum of points and authorities submitted herewith, respectfully move this Court to enter an order consolidating two related actions pending in this District, *Matthew Carr, et al. v. Flowers Foods, Inc. and Flowers Baking Co. of Oxford, Inc.*, No. 2:15-cv-06391-LS ("Carr") and *Luke Boulange v. Flowers Foods, Inc. and Flowers Baking Co. of Oxford, Inc.*, 2:16-cv-02581-JD ("Boulange"), pursuant

to Federal Rule of Civil Procedure 42(a). Additionally, Defendants request that the Court require the parties to meet and confer about whether the existing case management order should be revised and, if so, to submit a revised case management plan to the Court.

WHEREFORE, Defendants respectfully request that the Court consolidate the *Carr* and *Boulange* actions before Judge Stengel; order the parties to meet and confer over whether there should be a further amended case management schedule in light of the consolidation order and, if so, to file such a plan within fourteen (14) days; and award such other relief as the Court deems just and proper. A proposed order is submitted herewith.

Dated: June 13, 2016

Respectfully submitted,

**OGLETREE, DEAKINS, NASH  
SMOAK & STEWART, P.C.**

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 13, 2016, a copy of the foregoing was filed with the ECF system of the United States District Court for the Eastern District of Pennsylvania, which will give notice to the following counsel of record:

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